

Before the Federal Communications Commission, per the Petition for Reconsideration re RM 99-325, filed by John Wells King on behalf of Glen Clark & Associates, I find it to be very premature at the very least. Their suggestion that IBOC be allowed immediately on the expanded band is a tacit and unwitting admission that this transmission scheme is best suited to a completely new band, and not the standard AM broadcast band since the stations are dispersed to such a degree that it is the only place it can be done.

Secondly, it hasn't been proven to work during the day in many cases. I 'll cite two cases locally that it probably won't work at all. KTIS on 900 kHz licensed to Minneapolis/St. Paul and KDHL on 920 in Faribault, MN. Though KDHL beams its signal to the NE, it still has significant strength in much of the twin cities and all the way down to Rochester. Indeed, they have sold commercials to businesses over this wide area. The hybrid IBOC signal will trash the other station's analog signal. Yet another case would be KYCR on 1570, licensed to Golden Valley, MN, and WIXK licensed to New Richmond, WI. There would be significant mutual interference over St. Paul, which is well within coverage of both stations.

At night, the 300W KTIS signal would be rendered unuseable should WLS commence IBOC operation. When I worked at KTIS, I usually turned the monitor down on the AM side at night as it was hard to listen to all the interference just in analog mode. Plus IBOC has not been tested using only one sideband. I strongly suspect that it would lack the requisite robustness required of any digital system. I am also unimpressed with the quality of the digital audio stream used in the AM scheme. It is only suitable for talk, and I know that at least 40% of the AM stations in my area still have music as a primary format.

There also appears to be a contradiction on page 18 where at the end of the middle paragraph WMC would not be able to transmit the upper sidebands due to interference with 800 kHz New Orleans but would be able to transmit lower sidebands. At the end of the following paragraph it says WMC wouldn't be able to transmit the lower sidebands due to interference with WBBM. Sounds like WMC is out of luck either way.

One other thing that has been bothering me is just how many receivers have been tested to see if they would suffer interference from stations transmitting IBOC on second and third adjacent channels. Much has been made of current radios having only 5kHz audio response, but that is a red herring. It isn't the same thing as saying it won't suffer audible interference, and according to WLW's night tests, many people who couldn't hear the primary signal could hear the hash all the way out to both coasts. In light of all this, I ask that the Glen Clark and Associates petition be denied, and furthermore, for IBOC to be scrapped for use in the AM band.

Respectfully submitted,

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